

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO ALL GAS LOCAL DISTRIBUTION COMPANIES

D.T.E. 04-116

Respondent: Amy Smith

Information Request DTE-GAS 2-1

Q. Is it feasible to shorten the one hour odor call response time in the SQ Guidelines? Explain.

A. No, it is not feasible or appropriate to shorten the one-hour odor call response time in the SQ Guidelines. The Department has repeatedly stated that a uniform performance standard for response to odor calls is necessary because of the “extreme importance to the general public regardless of the size of the local gas distribution company.” Service Quality Guidelines, D.T.E. 99-84, at 40 (2001). However, there are legitimate operational reasons that there would be differences among the utilities, or even within single service territories, in terms of meeting the standard of 95% of calls responded to in 60 minutes or less. Response time is a function of distance, traffic congestion, time of day, weather and other factors beyond the control of the company. Each of the gas companies respond to odor calls with the highest priority, but each company (and even sub-areas within a larger single system) faces different challenges in getting field personnel to a particular site. To respond in 60 minutes or less, a gas company must have in place an elaborate system to have resources in place and/or to shift workforce resources at a moment’s notice from field activities to odor response. Shortening the response time will have a significant impact on the deployment and resource allocation plans of individual companies.

Therefore, the Department’s standard should be rigorous enough to ensure the public safety, but also must be a standard that is reasonably achievable *by all gas companies subject to the standard*. The current standard achieves this delicate balance as demonstrated by the historical performance of the gas utilities. Requiring the gas companies to respond to 95% of odor calls in a time period that is less than 60 minutes could have a significant operational impact on individual companies and should not be implemented without an understanding of those impacts.

In addition, there has been no instance on the KeySpan system where the Company’s response to an odor call in conformance with the standard has resulted in a gas incident causing personal injury or harm to property. KeySpan’s performance and the performance of other gas companies on this standard is

excellent. Therefore, there is no basis for changing the standard and imposing additional costs and operational requirements on the gas companies.